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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

**IN RE GOOGLE PLAY STORE
ANTITRUST LITIGATION**

THIS DOCUMENT RELATES TO:

Epic Games Inc. v. Google LLC et al.,
Case No. 3:20-cv-05671-JD

*In re Google Play Consumer Antitrust
Litigation*, Case No. 3:20-cv-05761-JD

State of Utah et al. v. Google LLC et al.,
Case No. 3:21-cv-05227-JD

Match Group, LLC et al. v. Google LLC et al.,
Case No. 3:22-cv-02746-JD

Case No. 3:21-md-02981-JD

**URGENT JOINT STIPULATION
REGARDING THE PARTIES' JOINT
PROPOSED SCHEDULE**

Judge: Hon. James Donato

1 In light of an urgent scheduling matter, all parties jointly submit this stipulation to extend
 2 the deadlines for merits expert discovery and *Daubert* and dispositive motions. The current
 3 deadlines for these events immediately follow the January 12, 2023 case management conference
 4 regarding the case schedule. The expert deposition period is currently set to run from
 5 December 23 through January 13. Absent relief, the parties would need to schedule and conduct
 6 18 expert depositions within the next three weeks and over the holidays, while also preparing for
 7 the January 12, 2023 evidentiary hearing regarding Google's electronic chat data. The current
 8 stipulation seeks to relieve the parties of the need to conduct these depositions pending the
 9 Court's decision on a revised schedule. The parties therefore respectfully request this immediate
 10 modest relief, while looking forward to discussing the overall case schedule during the upcoming
 11 January 12, 2023 status conference as the Court ordered yesterday (MDL Dkt. No. 398).

12 ***

13 WHEREAS, pursuant to the Court's November 15, 2022 Order directing the parties to
 14 file a joint proposed amended scheduling order (MDL Dkt. No. 374), the parties submitted a
 15 Joint Proposed Schedule on December 13, 2022. (MDL Dkt. No. 392.)

16 WHEREAS, on December 22, 2022, the parties filed a Proposed Order Granting the
 17 Parties' Joint Proposed Stipulation. (MDL Dkt. No. 396.)

18 WHEREAS, on December 22, 2022, the Court entered an order setting a status
 19 conference for January 12, 2023 at 1:30 p.m. regarding the case schedule. (MDL Dkt. No. 398.)

20 WHEREAS, under the operative scheduling order, the deadline for merits expert
 21 discovery is January 13, 2023 and the deadline to file dispositive and *Daubert* motions, if any, is
 22 January 17, 2023. (MDL Dkt. No. 338.)

23 WHEREAS, while uncertainty in the upcoming deadlines for merits expert discovery and
 24 dispositive and *Daubert* motions remains, absent further relief from the Court the parties must
 25 prepare on the assumption that 18 expert depositions and the evidentiary hearing will occur in
 26 the first two weeks of January, significantly impacting the December and January schedules for
 27 counsel and experts.

WHEREAS, the parties met and conferred on December 22, 2022 and agreed, pending discussions with the Court on January 12 and any further orders on scheduling, to extend these deadlines on an interim basis to February 3, 2023 and February 7, 2023, respectively, to alleviate uncertainty until the full scheduling order can be resolved at the status conference.

THEREFORE, the parties hereby stipulate and agree to the following schedule modifications in advance of the January 12, 2023 status conference.

Event	Current Deadline (MDL Dkt. No. 338)	Stipulated Interim Deadline
Merits experts discovery cut-off	January 13, 2023	February 3, 2023
Last day to file dispositive and <i>Daubert</i> motions if any	January 17, 2023	February 7, 2023

Dated: December 23, 2022

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Respectfully submitted,

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E-FILING ATTESTATION

I, Lauren A. Moskowitz, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

/s/ Lauren A. Moskowitz
Lauren A. Moskowitz